

Ms. Jocelyn Boyd, Chief Clerk South Carolina Public Service Commission 101 Executive Center Dr. Columbia, SC 29210

RE: Working Assets Funding Service, Inc. d/b/a Credo Long Distance

Tariff Revision - South Carolina Tariff No. 2 (Interexchange)

Dear Ms. Boyd:

Enclosed for filing please find the original of the above-referenced tariff filing submitted on behalf of Working Assets Funding Service, Inc. d/b/a Credo Long Distance. The purpose of this filing is to remove/delete services from the tariff which are no longer offered by the Company; specifically, business long distance service (including toll-free service), calling card service and operator services.

Included with this filing is a copy of the Applications filed with the Federal Communications Commission ("FCC") for authority to discontinue resold business services (Attachment A) and calling card services (Attachment B), along with the applicable customer notification(s) is also provided with this filing. The Company respectfully requests an effective date for this filing of January 1, 2013.

The following tariff pages are included with this filing:

2 <sup>nd</sup> Revised Page 1	Updates Check Sheet
1 <sup>st</sup> Revised Page 3	Updates Table of Contents
1 <sup>st</sup> Revised Page 6	Deletes "Commercial MTS" definition
1 <sup>st</sup> Revised Page 8	Deletes "800 Services" definition
1 <sup>st</sup> Revised Page 9	Removes reference to commercial usage
1 <sup>st</sup> Revised Page 10	Removes reference to 800 Services
1 <sup>st</sup> Revised Page 11	Removes reference to Commercial MTS; Deletes 800 Services & 800
C	Personal Identification Service
1 <sup>st</sup> Revised Page 12	Deletes Term Plans
1 <sup>st</sup> Revised Page 23	Deletes Commercial Service Rates
1 <sup>st</sup> Revised Pages 24, 25	Deletes Operator Services
1 <sup>st</sup> Revised Page 26	Deletes Calling Card Services
1 <sup>st</sup> Revised Page 27	Removes reference to commercial subscribers
1 <sup>st</sup> Revised Page 28	Removes reference to Calling Card & Operator Service calls
1 <sup>st</sup> Revised Page 29	Deletes 800 Service & Commercial Volume Discounts
1 <sup>st</sup> Revised Page 30	Deletes Business Advantage Term Plan III
1 <sup>st</sup> Revised Page 31	Deletes Non-Profit Term Plan II
1 <sup>st</sup> Revised Page 32	Deletes Small Business Term Plan
1 <sup>st</sup> Revised Pages 33, 34	Deletes Calling Card rates [from Peak Rate Calling Plans]
1 <sup>st</sup> Revised Page 35	Deletes Calling Card rates [from One Rate Calling Plan No. 2]
1 <sup>st</sup> Revised Page 36	Deletes One Rate Calling Card Plan
1 <sup>st</sup> Revised Page 37	Deletes Payphone Surcharge

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The following tariff pages are included with this filing (continued):

1 <sup>st</sup> Revised Page 38	Deletes Commercial Service Rates
1 <sup>st</sup> Revised Page 39	Deletes Operator Services
1st Revised Page 40	Deletes Calling Card Usage Rates, Operator Call Placement Charges &
	Calling Card Surcharge
1 <sup>st</sup> Revised Page 41	Deletes Business Advantage Term Plan III, Non-Profit Term Plan II &
	Small Business Term Plan; Deletes Calling Card rates [from Peak Rate
	Calling Plan No. 1]
1 <sup>st</sup> Revised Page 42	Deletes Calling Card rates [from Peak Rate Calling Plan No. 2 & 3];
	Deletes Calling Card Plan & Payphone Surcharge
1 <sup>st</sup> Revised Page 43	Removes reference to Calling Card & Operator Services
1 <sup>st</sup> Revised Page 44	Deletes Carding Card Rates [from Peak Rate Calling Plan No. 2]
1 <sup>st</sup> Revised Page 45	Deletes Carding Card Rates [from Peak Rate Calling Plan No. 4 & 5]
1 <sup>st</sup> Revised Page 46	Deletes Carding Card Rates [from One Rate Calling Plan No. 1]
1 <sup>st</sup> Revised Page 47	Deletes Carding Card Rates [from Combination Plan]
1 <sup>st</sup> Revised Page 48	Deletes Carding Card Rates [from One Rate Calling Plan No. 3 & 4]
1 <sup>st</sup> Revised Page 49	Deletes Carding Card Rates [from One Rate Calling Plan No. 5]

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3001 or via email to <u>tforte@tminc.com</u>. Thank you for your assistance in this matter.

Sincerely,

#### /s/ Thomas M. Forte

Thomas M. Forte

Consultant to Working Assets Funding Service, Inc.

cc: Nathanael Bryant - Working Assets

Nathanael Bryant (Via Email) - Working Assets

Mr. C. Dukes Scott, Executive Director

file: Working Assets - South Carolina - IXC

tms: SCi1201

Enclosures

TF/mw

#### **CHECK SHEET**

Pages of this tariff are effective as of the date shown on each of the respective page(s). Original and revised pages as named below comprise all changes from the original Tariff and are currently in effect as of the date on this page.

PAGE	REVISION		PAGE	REVISION	
Title	Original		27	1 <sup>st</sup> Revised	*
1	2 <sup>nd</sup> Revised	*	28	1 <sup>st</sup> Revised	*
2	Original		29	1 <sup>st</sup> Revised	*
3	1 <sup>st</sup> Revised	*	30	1 <sup>st</sup> Revised	*
4	Original		31	1 <sup>st</sup> Revised	*
5	Original		32	1 <sup>st</sup> Revised	*
6	1 <sup>st</sup> Revised	*	33	1 <sup>st</sup> Revised	*
7	Original		34	1 <sup>st</sup> Revised	*
8	1 <sup>st</sup> Revised	*	35	1 <sup>st</sup> Revised	*
9	1 <sup>st</sup> Revised	*	36	1 <sup>st</sup> Revised	*
10	1 <sup>st</sup> Revised	*	37	1 <sup>st</sup> Revised	*
11	1 <sup>st</sup> Revised	*	38	1 <sup>st</sup> Revised	*
12	1 <sup>st</sup> Revised	*	39	1 <sup>st</sup> Revised	*
13	Original		40	1 <sup>st</sup> Revised	*
14	Original		41	1 <sup>st</sup> Revised	*
15	Original		42	1 <sup>st</sup> Revised	*
16	Original		43	1 <sup>st</sup> Revised	*
17	Original		44	1 <sup>st</sup> Revised	*
18	Original		45	1 <sup>st</sup> Revised	*
19	Original		46	1 <sup>st</sup> Revised	*
20	Original		47	1 <sup>st</sup> Revised	*
21	Original		48	1 <sup>st</sup> Revised	*
22	1 <sup>st</sup> Revised		49	1 <sup>st</sup> Revised	*
23	1 <sup>st</sup> Revised	*			
24	1 <sup>st</sup> Revised	*			
25	1 <sup>st</sup> Revised	*			
26	1st Revised	*			

<sup>\* -</sup> New or revised pages

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#### SECTION 1 – GENERAL REGULATIONS

# 1.1 Application of Tariff

- 1.1.1 This Tariff contains the descriptions, regulations, and rates applicable to the furnishing of telecommunications services provided by Working Assets Funding Service, Inc. d/b/a Credo Long Distance, with principal offices at 101 Market Street, Suite 700, San Francisco, California 94105.
- 1.1.2 This Tariff applies to services furnished statewide within the state of South Carolina. This Tariff is on file with the South Carolina Public Service Commission, and copies may be inspected during normal business hours, at the Company's principal place of business.

#### 1.2 Definitions

Certain terms used generally throughout this tariff for communications services furnished by the Carrier over its facilities are defined below.

<u>Automatic Number Identification (ANI)</u> - The calling telephone number identification that will be forwarded to the Company's network by the Local Exchange Company (LEC) as a call is placed. ANI is provided by the LEC only when LEC switch access Feature Group B direct or Feature Group D interconnections are used to gain access to Company's switched telecommunications service.

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Company or Carrier - Working Assets Funding Service, Inc., d/b/a Credo Long Distance.

<u>Day</u> - From 8:00 AM up to, but not including, 5:00 PM local time on Monday through Friday, excluding Carrier-specified holidays.

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# 1.2 Definitions, (Cont'd.)

ORS – The South Carolina office of Regulatory Staff.

Rate Center - A geographically specified point used to determine mileage dependent rates.

<u>Regular Billing</u> - A standard bill sent in the normal Carrier Billing cycle. This billing consists of one bill for each amount assigned to the subscriber together with explanatory detail showing the derivation of the charges.

<u>Residential Use</u> – Average monthly usage that is 1000 minutes or less with less than a 3.5 minute average call length.

<u>Subscriber</u> - The person, firm, company or corporation, or other entity, having a communication requirement of its own, which contracts for service under this tariff and is responsible for the payment of charges as well as compliance with the Carrier's regulations pursuant to this tariff.

SCPSC – South Carolina Public Service Commission.

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#### 1.3 Description of Services

1.3.1 Working Assets Funding Service, Inc. d/b/a Credo Long Distance is a communications common carrier providing various interexchange communications services. Specific service offerings are described below.

#### 1.3.2 Timing of Calls

The Subscriber's long distance usage charge is based on the actual usage of Carrier's network. Usage begins when the called party picks up the receiver. When the called party picks up is determined by hardware answer supervision in which the local telephone company sends a signal to the switch or the software utilizing audio tone detection. A call is terminated when the calling party hangs up. Residential usage charges are rounded to the next full minute.

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#### 1.3.3 Calculation of Distance

- A. Usage charges for all mileage sensitive products are based on the airline distance between rate centers associated with the originating and terminating points of the call.
- B. The airline mileage between rate centers is determined by applying the formula below to the vertical and horizontal coordinates associated with the rate centers involved. The Company uses the rate centers and associated vertical and horizontal coordinates that are produced by Bell Communications Research in the NA-NXX V&H Coordinates Tape and Bell's NECA Tariff No. 4.

Formula:

$$\sqrt{\frac{(V_1V_2)^2 + (H_1H_2)^2}{10}}$$

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# 1.3 Description of Services, (Cont'd.)

# 1.3.4 Minimum Call Completion Rate

A Subscriber can expect a call completion rate of not less than 99.6% during peak use periods for all Feature Group D services (1+ dialing).

#### 1.3.5 Service Hours

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- A. Service is available 24 hours a day, seven days a week. Rate periods are applicable as indicated in the chart below and are based on the time at the point of origin of the call. The night/weekend rate shall also apply for 24 hours on Carrier-specified holidays as defined in Section 1.2.
- B. Calls that begin in one rate period and terminate in another will be prorated accordingly.

Rate Period Chart

	Monday - Friday	Sat.	Sun.
8 a.m.	Daytime Rate Period		
to 5 p.m.*			
5 p.m.	Evening Rate Period		Evening
to 11 p.m.*			Rate
			Period
11 p.m.	Night/Weekend Rate Period		
to 8 a.m.*			

To, but not including

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- 1.3 Description of Services, (Cont'd.)
  - 1.3.6 Emergency Services

Calls to Emergency Services are provided at no charge.

- 1.3.7 Service Offerings
  - A. Message Telecommunications Services (MTS)
    - 1. Residential Message Telecommunications Service (MTS) are intercity services available for use by subscribers 24 hours a day. The subscriber's telephone line(s) are programmed by the local telephone company to automatically route "1+" and/or "10XXX" calls to the network.
    - 2. Subscribers may originate MTS from all locations and may terminate calls in all locations within the State of South Carolina.
  - B. Reserved for Future Use

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C. Reserved for Future Use

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- 1.3 Description of Services, (Cont'd.)
  - 1.3.7 Service Offerings, (Cont'd.)
    - D. Reserved for Future Use

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E. Peak Rate Calling Plans

These calling plans have flat rates in peak and non-peak time periods. They are available only to residential customers.

F. One Rate Calling Plans

These calling plans have a 24 hour flat rate. They are available only to residential customers.

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#### SECTION 2 – RATES

2.1 Message Telecommunications Service (MTS)



- 2.2 Directory Assistance (Available to MTS Subscribers)
  - 2.2.1 Subscribers will be billed a maximum of \$1.50 per call for directory assistance calls, except for the first two such calls in a given billing period of one month's duration, which shall be free of charge.
  - 2.2.2 A credit allowance for Directory Assistance will be provided on request if subscriber experiences poor transmission quality, is cut-off, receives an incorrect telephone number, or misdials the intended Directory Assistance number.

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# 2.3 Reserved for Future Use

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2.3 Reserved for Future Use, (Cont'd.)

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2.4 Reserved for Future Use

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#### 2.5 Intranetwork Discount

- 2.5.1 For residential subscribers, a 25% discount will be applied to those calls that terminate to other subscribers of the Company's communications services.
- 2.5.2 Reserved for Future

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- 2.5.3 For residential subscribers whose total usage charges exceed \$25.00 per month a 15% discount shall be applied to all of their intrastate usage.
- 2.5.4 MTS calls from hearing-impaired Company customers using teletypewriters for residential telecommunications will be discounted by 20%. This discount is in addition to any other applicable discount. Customer must provide the Company with a medical doctor's signed statement verifying his or her impairment prior to receiving discount.

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#### SECTION 2 – RATES, (CONT'D.)

#### 2.6 Other Discounts

- 2.6.1 For residential subscribers, calls made to political leaders who are the subjects of an action alert in the subscriber's previous monthly invoice will be free of charge. Two such calls per day of up to five minutes in duration can be made.
- 2.6.2 For residential subscribers, a 25% discount will be applied to those calls that terminate to other subscribers of the Company's communications services.
- 2.6.3 MTS calls from hearing-impaired Company customers using teletypewriters for residential telecommunications will be discounted by 20%. This discount is in addition to any other applicable discount. Customer must provide the Company with a medical doctor's signed statement verifying his or her impairment prior to receiving discount.

#### 2.7 Application of Discounts

2.7.1 When traffic qualifies for both the Intranetwork and volume discounts, only the greater of the two discounts will apply.

#### 2.8 Promotional Offerings

2.8.1 Promotional offerings of reduced rates or waiver of rates for limited periods of time may be offered by contract to selected classes of commercial subscribers. Promotional offerings will be filed as tariff revisions with the PSC.

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Reserved for Future Use

# SECTION 2 – RATES, (CONT'D.)

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#### 2.11 Reserved for Future Use

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# 2.12 Reserved for Future Use

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#### 2.13 Reserved for Future Use

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# 2.14 Peak Rate Calling Plans

# 2.14.1 Peak Rate Calling Plan No. 1

Customers selecting this Peak Rate Plan receive direct dial MTS service at the following Maximum rates:

		Peak	Off-Peak
Dial 1			
	InterLATA	\$0.50 per minute	\$0.30 per minute
	IntraLATA	\$0.25 per minute	\$0.20 per minute

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Volume and Friendship discounts do not apply to traffic priced at these rates

This Plan is the intrastate complement to, and is only available in combination with, the interstate Peak Rate Plan contained in FCC No. 1, Section 21.1

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# 2.14 Peak Rate Calling Plans, (Cont'd.)

#### 2.14.2 Peak Rate Calling Plan No. 3

Customers selecting this Peak Rate Plan receive direct dial MTS service at the following Maximum rates:

		Peak	Off-Peak
Dial 1			
	InterLATA	\$0.30 per minute	\$0.20 per minute
	IntraLATA	\$0.30 per minute	\$0.20 per minute

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Volume and Friendship discounts do not apply to traffic priced at these rates

This Plan is the intrastate complement to, and is only available in combination with, the interstate Peak Rate Plan contained in FCC No. 1, Section 21.7.

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# 2.15 One Rate Calling Plans

# 2.15.1 Calling Plan No. 2

Customers selecting this One Rate Plan receive direct dial MTS service at the following maximum rates:

Dial 1:

InterLATA \$0.30 per minute IntraLATA \$0.20 per minute

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Volume and Friendship discounts do not apply to traffic priced at these rates.

This Plan is the intrastate complement to, and is only available in combination with, the interstate One Rate Plan contained in FCC No. 1, Section 22.2, 22.5, and 22.6.

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# 2.15 One Rate Calling Plans, (Cont'd.)



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# 2.16 Miscellaneous Charges



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#### SECTION 3 – CURRENT RATES

3.1 Reserved for Future Use (T)

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3.2 Directory Assistance (Available to MTS Subscribers)

Rate Per call: \$0.45

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#### SECTION 3 – CURRENT RATES

3.3 Reserved for Future Use (T)

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# SECTION 3 – CURRENT RATES, (CONT'D.)

3.4 Reserved for Future Use

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3.5 Reserved for Future Use

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3.6 Reserved for Future Use

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3.7 Reserved for Future Use

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SECTION 3 –	CURRENT RATES.	(CONT'D)

3.8 Reserved for Future Use **(D)** 

3.9 Reserved for Future Use (T/D)

3.10 Reserved for Future Use (T/D)

Off-Peak

3.11 Peak Rate Calling Plan No. 1

> Dial 1 \$0.25 per minute InterLATA \$0.15 per minute IntraLATA \$0.10 per minute \$0.10 per minute

Peak

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# SECTION 3 – CURRENT RATES, (CONT'D.)

# 3.12 Peak Rate Calling Plan No. 3

Dial 1		Peak	Off-Peak
Diai i	InterLATA	\$0.30 per minute	\$0.20 per minute
	IntraLATA	\$0.30 per minute	\$0.20 per minute

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# 3.13 One Rate Calling Plan No. 2

Dial 1:

InterLATA \$0.15 per minute IntraLATA \$0.10 per minute

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#### SECTION 4 – GRANDFATHERED SERVICES

- 4.1 Message Telecommunications Service (MTS)
  - 4.1.1 Dial-1 service is available for origination from Feature Group D end office within the State of South Carolina. (T)
  - 4.1.2 Residential Service Rates

Residential service is billed by whole minutes, with partial minutes of usage rounded up to the next whole minute. Rates are as follows:

InterLATA

		Initial			Additional	
Mileage	Day	Evening	Night/Wkend	Day	Evening	Night/Wkend
0-10	.2300	.1700	.1440	.1300	.0975	.0780
11-16	.2400	.1800	.1500	.1400	.1050	.0840
17-22	.2600	.1850	.1600	.1900	.1400	.1140
23-30	.2700	.1900	.1650	.2300	.1725	.1440
31-55	.2900	.1900	.1650	.2300	.1725	.1440
56-70	.3100	.2100	.1760	.2600	.2000	.1620
71-124	.3100	.2150	.1810	.2900	.2150	.1740
125+	.3200	.2350	.1930	.3180	.2350	.1920

#### IntraLATA

		Initial			Additional	
Mileage	Day	Evening	Night/Wkend	Day	Evening	Night/Wkend
0-10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10
11-16	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10
17-22	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10
23-30	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10
31-55	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10
56-70	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10
71-124	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10
125+	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10	\$0.10

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#### 4.2 Peak Rate Plans

#### 4.2.1 Peak Rate Calling Plan No. 2

Customers selecting this Peak Rate Plan receive direct dial MTS service at the following rates:

		Peak	Off-Peak
Dial 1			
	InterLATA	\$0.15 per minute	\$0.15 per minute
	IntraLATA	\$0.10 per minute	\$0.10 per minute

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**(D)** 

Volume and Friendship discounts do not apply to traffic priced at these rates

This Plan is the intrastate complement to, and is only available in combination with, the interstate Peak Rate Plan contained in FCC No. 1, Section 21.2.

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# 4.2 Peak Rate Plans (Cont'd.)

#### 4.2.2 Peak Rate Calling Plan No. 4

Customers selecting this Peak Rate Plan receive direct dial MTS service at the following rates:

Dial 1		Peak	Off-Peak
Diai i	InterLATA	\$0.12 per minute	\$0.12 per minute
	IntraLATA	\$0.10 per minute	\$0.10 per minute

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Volume and Friendship discounts do not apply to traffic priced at these rates

This Plan is the intrastate complement to, and is only available in combination with, the interstate Peak Rate Plan contained in FCC No. 1, Section 21.8

#### 4.2.3 Peak Rate Calling Plan No. 5

Customers selecting this Peak Rate Plan receive direct dial MTS service at the following rates:

		Peak	Off-Peak
Dial 1			
	InterLATA	\$0.25 per minute	\$0.12 per minute
	IntraLATA	\$0.10 per minute	\$0.10 per minute

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Volume and Friendship discounts do not apply to traffic priced at these rates

This Plan is the intrastate complement to, and is only available in combination with, the interstate Peak Rate Plan contained in FCC No. 1, Section 21.9.

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# 4.3 One Rate Calling Plans

# 4.3.1 Calling Plan No. 1

Customers selecting this One Rate Plan receive direct dial MTS service at the following rate, regardless of the time of day or day of week of the call:

Dial 1:

InterLATA \$0.15 per minute IntraLATA \$0.10 per minute

**(D**)

**(D)** 

Volume and Friendship discounts do not apply to traffic priced at these rates.

This Plan is the intrastate complement to, and is only available in combination with, the interstate One Rate Plan contained in FCC No. 1, Section 22.1.

Issued: December 20, 2012 Effective: January 1, 2013

Issued by: Stephen Gunn, Vice President of Operations

101 Market Street, Suite 700 San Francisco, California 94105

# 4.3 One Rate Calling Plans, (Cont'd)

#### 4.3.2 Combination Plan

Those Company Customers who subscribe to the Company Internet service; receive bills via e-mail; and who pay their bills via automatic deduction from a checking account may receive interstate telephone service at the rates listed below:

Dial 1:

InterLATA: \$0.10 per minute IntraLATA: \$0.10 per minute

**(D)** 

**(D)** 

Volume and Friendship discounts do not apply to traffic priced at these rates.

Customers must comply with all three eligibility requirements to be able to choose this plan. If after enrolling in this calling plan the customer discontinues any one of the qualifying requirements, the customer is subject to removal from the plan, at which time s/he will automatically be returned to her/his previous Company billing arrangement. If the customer enrolled in the plan at the initiation of Company service, the customer will be transferred to the Peak Rate Calling Plan No. 1.

This plan is a complement to, and is only available in combination with, the interstate calling plan in the Company's interstate tariff, FCC No. 1, Section 22.8

Issued: December 20, 2012 Effective: January 1, 2013

Issued by: Stephen Gunn, Vice President of Operations

101 Market Street, Suite 700 San Francisco, California 94105

# 4.3 One Rate Calling Plans, (Cont'd)

# 4.3.3 Calling Plan No. 3

This Calling Plan is the intrastate add-on to, and is only available in combination with the interstate calling plan located in the Company Tariff F.C.C. No. 1, Section 22.9 and 22.10.

Dial 1:

InterLATA \$0.10 per minute IntraLATA \$0.10 per minute

**(D)** 

**(D)** 

Volume and Friendship discounts do not apply to traffic priced at these rates.

#### 4.3.4 Calling Plan No. 4

Customers selecting this One Rate Plan receive direct dial MTS service at the following rate:

Dial 1:

InterLATA \$0.10 per minute IntraLATA \$0.10 per minute

**(D)** 

**(D)** 

Volume and Friendship discounts do not apply to traffic priced at these rates.

This Plan is the intrastate complement to, and is only available in combination with the interstate One Rate Plan contained in FCC. No. 1, Section 22.11.

Issued: December 20, 2012 Effective: January 1, 2013

Issued by: Stephen Gunn, Vice President of Operations

101 Market Street, Suite 700 San Francisco, California 94105

#### SECTION 4 – GRANDFATHERED SERVICES, (CONT'D.)

- 4.3 One Rate Calling Plans, (Cont'd)
  - 4.3.5 Calling Plan No. 5

Customers selecting this One Rate Plan receive direct dial MTS service at the following rate:

Dial 1:

InterLATA \$0.10 per minute IntraLATA \$0.10 per minute

**(D**)

**(D)** 

Volume and Friendship discounts do not apply to traffic priced at these rates.

This Plan is the intrastate complement to, and is only available in combination with the interstate One Rate Plan contained in FCC. No. 1, Section 22.7.

Issued: December 20, 2012 Effective: January 1, 2013

Issued by: Stephen Gunn, Vice President of Operations

101 Market Street, Suite 700 San Francisco, California 94105

SCi1201

#### WORKING ASSETS FUNDING SERVICE, INC.

d/b/a Credo Long Distance

#### **ATTACHMENT A-1**

Application of Working Assets Funding Service, Inc.

For Authority Pursuant to Section 214 of The Communications Act of 1934, as Amended, To Discontinue the Provision of

RESOLD BUSINESS LONG DISTANCE SERVICE

# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.

• •	)	
In the Matter of	)	
Section 63.71 Application of	)	File No.
Working Assets Funding Service, Inc. offered as	)	
Working Assets Business Long Distance	)	
	)	
For Authority Pursuant to Section 214 of	)	
The Communications Act of 1934, as Amended,	)	
To Discontinue the Provision of Service	)	
	_ )	

# SECTION 63.71 APPLICATION OF WORKING ASSETS FUNDING SERVICE, INC. OFFERED AS WORKING ASSETS BUSINESS LONG DISTANCE

Working Assets Funding Service, Inc. offered as Working Assets Business Long

Distance ("Working Assets") submits this Application for authority under Section 214(a) of the

Communications Act of 1934, as amended, and Section 63.71 of the Commission's rules, to

discontinue its resold business long distance service (including toll-free service) to

approximately 854 business customers whose services are supported by a billing platform that

Working Assets intends to decommission. Effective December 31, 2012, when the billing

platform is decommissioned, affected business customers will no longer receive business long

distance service (including toll-free service) from Working Assets.

Pursuant to Sections 63.71 (a) and (b) of the Commission's rules, Working Assets provides the following information:

#### 1. Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):

Working Assets Funding Service, Inc. offered as Working Assets Business Long Distance

703962457v1

### 2. Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization to discontinue service pursuant to Section 63.71(c) of the Commission's rules, effective December 31, 2012, Working Assets will cease providing business long distance service (including toll-free service) to affected business customers.

### 3. Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Subject to the Commission's authorization, Working Assets will discontinue business long distance service (including toll-free service) to business customers located in all states (except Alaska where Working Assets does not currently offer service) and the District of Columbia.

### 4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

Working Assets' Business Long Distance offers long distance and toll-free service to business customers as a reseller. Working Assets currently has approximately 854 Business Long Distance customers. Effective December 31, 2012, however, Working Assets will have to decommission its billing platform that has supported business long distance (including toll-free) service, and will be unable to provide this service to the affected customers once that billing platform is decommissioned.

Working Assets has informed its business customers that they may select a different provider for business long distance (including toll-free) service, and these customers have other options. Affected business customers will have the opportunity to switch to other facilities-based providers, such as Sprint, that offer business long distance service at competitive rates. In addition, Working Assets will aid its business customers with the transition of their toll-free

numbers to minimize any disruption. As a result, the public convenience and necessity should not be impaired by this discontinuance.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

Working Assets sent notices to affected business customers by first class United States mail, postage pre-paid, on November 21, 2012. A copy of the notice is attached as Exhibit A.

Working Assets is sending copies of this Application by first class United States mail to the governor and public utilities commission for each affected state, as well as to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71 (b)(4)):

Working Assets is considered non-dominant with respect to the services to be discontinued.

Working Assets respectfully requests that the Commission approve this Application.

Additional questions regarding this Application may be addressed to the undersigned.

Respectfully submitted,

Jean Parker, Legal Director

Working Assets Funding Service, Inc.

offered as Working Assets Business Long Distance

101 Market Street, Suite 700

San Francisco, CA 94105

(415) 369-2053

November 21, 2012

## **WORKING ASSETS FUNDING SERVICE, INC.** d/b/a Credo Long Distance

#### **ATTACHMENT A-2**

CUSTOMER NOTICE



November 21, 2012

Working Assets Business Long Distance 101 Market St., Suite 700 San Francisco, CA 94105

Re: Account number

Dear Working Assets Business Long Distance Member,

I'm writing to let you know that we'll be ending the specific business long distance service for which you are a customer on December 31, 2012. We're sending this notice to our business customers nationwide. Please rest assured that Working Assets/CREDO is not leaving the telecommunications business — we are simply consolidating all of our long distance plans onto a new billing platform which does not support business long distance services.

As part of this transition, we'll be ending the following services:

- \*Toll-free numbers and 800 numbers
- \*Validation codes and accounting codes
- \*Conference calling
- \*Calling cards and travel cards
- \*Billing in 6-second increments

To avoid loss of these services, please contact an alternative long distance provider before December 31, 2012, and transfer your service from Working Assets/CREDO to your new provider.

If you do not move your services to an alternative provider before December 31, 2012, you will be switched to a residential plan and will lose access to the business services described above. On January 1, 2013, you will be automatically switched to our \$5.95, 5-cent residential long distance plan. All interstate calls will be billed at 5 cents a minute and calls will be rounded up to the minute, not billed in six-second increments as before.

(over, please)

You can also switch any landline number (except 800 numbers) to mobile service with CREDO Mobile. CREDO Mobile voice plans include free domestic long distance and start at just \$29.99 a month. And we'll waive the activation fee for any Working Assets business long distance customer who signs up for CREDO Mobile service. To learn more, or to sign up for CREDO Mobile, give us a call at 888-800-4336 or visit us online at credomobile.com.

We value your connection to Working Assets/CREDO and to the progressive causes we support. Over the years, you have made a real difference in the world through our donations program. I realize that you may need long distance services that we will no longer provide and that you might move to another provider. If so, thank you for your loyalty over the years. It's my hope that we will be able to continue providing you service with CREDO Mobile service.

Sincerely,

Stephen Gunn

VP of Customer Relations Working Assets/CREDO

FCC required notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible but no later than 15 days after the commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Section 63.71 Application of Working Assets Funding Service Inc. offered as Working Assets Business Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.



Working Assets Business Long Distance 101 Market St., Suite 700 San Francisco, CA 94105 November 21, 2012

Re: Account number

Dear Working Assets Business Long Distance Member,

I'm writing to let you know that we'll be ending the specific business long distance service for which you are a customer on December 31, 2012. We're sending this notice to our business customers nationwide. Please rest assured that Working Assets/CREDO is not leaving the telecommunications business – we are simply consolidating all of our long distance plans onto a new billing platform which unfortunately does not support business long distance services.

On January 1, 2013, you will be automatically switched to our \$5.95, 5-cent residential long distance plan and your long distance service will not be interrupted. All interstate calls will be billed at 5 cents a minute and calls will be rounded up to the minute, not billed in six-second increments as before.

If you prefer not to have your service switched from business to residential, please contact an alternative long distance provider before December 31, 2012, and transfer your service from Working Assets/CREDO to your new provider.

You can also switch any landline number (except 800 numbers) to mobile service with CREDO Mobile. CREDO Mobile voice plans include free domestic long distance and start at just \$29.99 a month. And we'll waive the activation fee for any Working Assets business long distance customer who signs up for CREDO Mobile service. To learn more, or to sign up for CREDO Mobile, give us a call at 888-800-4336 or visit us online at credomobile.com.

(over, please)

We value your connection to Working Assets/CREDO and to the progressive causes we support. Over the years, you have made a real difference in the world through our donations program. I realize that you may need long distance services that we will no longer provide and that you might move to another provider. If so, thank you for your loyalty over the years. It's my hope that we will be able to continue providing you service with our residential long distance or CREDO Mobile service.

Sincerely,

Stephen Gunn

VP of Customer Relations Working Assets/CREDO

FCC required notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible but no later than 15 days after the commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Section 63.71 Application of Working Assets Funding Service Inc. offered as Working Assets Business Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.



101 Market Street, Suite 700, San Francisco, CA 94105 credomobile.com • credolongdistance.com

November 21, 2012

CREDO Long Distance 101 Market St., Suite 700 San Francisco, CA 94105

Re: Account number [ACCOUNT NUMBER]

Dear CREDO Long Distance Member,

I'm writing to let you know that we'll be discontinuing the toll-free service on your account on December 31, 2012. We're sending this notice to our toll-free service customers nationwide. Please rest assured that the rest of your residential long distance service will remain unchanged—we are simply consolidating all of our long distance plans onto a new billing platform which does not support toll-free numbers.

To avoid loss of your toll-free number, please contact an alternative toll-free service provider before December 31, 2012, and transfer your toll-free number from Working Assets/CREDO to your new provider.

We value your connection to Working Assets/CREDO and to the progressive causes we support. Over the years, you have made a real difference in the world through our donations program. It's my hope that we will to continue to provide you residential long distance service for years to come.

Sincerely,

Stephen Gunn

VP of Customer Relations

Working Assets/CREDO

FCC required notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and

necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible but no later than 15 days after the commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Section 63.71 Application of Working Assets Funding Service Inc. offered as Working Assets Business Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

#### WORKING ASSETS FUNDING SERVICE, INC.

d/b/a Credo Long Distance

#### **ATTACHMENT B-1**

Application of Working Assets Funding Service, Inc. d/b/a Credo Long Distance

For Authority Pursuant to Section 214 of The Communications Act of 1934, as Amended, To Discontinue the Provision of

POST-PAID CALLING CARD SERVICE

# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.

In the Matter of	)
Section 63.71 Application of	)
Working Assets Funding Service, Inc. dba	File No.
Credo Long Distance	)
For Authority Pursuant to Section 214 of The Communications Act of 1934, as Amended, To Discontinue the Provision of Service	) ) ) )

#### SECTION 63.71 APPLICATION OF WORKING ASSETS FUNDING SERVICE, INC. dba CREDO LONG DISTANCE

Working Assets Funding Service, Inc. dba Credo Long Distance ("Working Assets") submits this Application for authority under Section 214(a) of the Communications Act of 1934, as amended, and Section 63.71 of the Commission's rules, to discontinue post-paid calling-card service to approximately 9,000 customers whose calling-card services are supported by a billing platform that Working Assets intends to decommission. Effective December 31, 2012, when the billing platform is decommissioned, affected customers will no longer receive post-paid calling-card service from Working Assets.

Pursuant to Sections 63.71 (a) and (b) of the Commission's rules, Working Assets provides the following information:

#### 1. Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1), (b)(2)):

Working Assets Funding Service, Inc. dba Credo Long Distance 101 Market Street, Suite 700 San Francisco, CA 94105

703962067v1

#### 2. Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization to discontinue service pursuant to Section 63.71(c) of the Commission's rules, effective December 31, 2012, Working Assets will cease providing post-paid calling-card service to affected customers.

#### 3. Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Subject to the Commission's authorization, Working Assets will discontinue post-paid calling-card service to customers located in all states (except Alaska where Working Assets does not currently offer service) and the District of Columbia.

#### 4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

Working Assets' post-paid calling card service has been provided as an additional service to its long distance subscribers and as a stand-alone service. Working Assets currently has approximately 9,000 customers who have post-paid calling cards. Effective December 31, 2012, however, Working Assets will have to decommission its billing platform that has supported post-paid calling-card service, and Working Assets will be unable to provide service to the affected customers once that billing platform is decommissioned. Affected customers' long distance service with Working Assets will not be impacted by the planned discontinuance of post-paid calling-card service.

Working Assets has informed customers that they may select a different provider for post-paid calling card service, and these customers have other options. The calling cards involved in this discontinuance are post-paid, and costs for calls using the calling card are billed to the customer's account. While once extremely popular, use of these cards has significantly declined. Pre-paid calling cards and mobile phones (both pre-paid and monthly plans) are widely available and are offered at competitive rates. Affected customers that desire post-paid

calling cards will have the opportunity to switch to other providers that offer the service at competitive rates. As a result, the public convenience and necessity should not be impaired by this discontinuance.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

Working Assets sent notices to affected customers by first class United States mail, postage pre-paid, on November 21, 2012. A copy of the notice is attached as Exhibit A.

Working Assets is sending copies of this Application by first class United States mail to the governor and public utilities commission for each affected state, as well as to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71 (b)(4)):

Working Assets is considered non-dominant with respect to the services to be discontinued.

Working Assets respectfully requests that the Commission approve this Application.

Additional questions regarding this Application may be addressed to the undersigned.

Respectfully submitted,

Jean Parker, Legal Director

Working Assets Funding Service, Inc.

dba Credo Long Distance

101 Market Street, Suite 700

San Francisco, CA 94105

(415) 369-2053

November 21, 2012

## **WORKING ASSETS FUNDING SERVICE, INC.** d/b/a Credo Long Distance

#### **ATTACHMENT B-2**

**CUSTOMER NOTICE** 



#### 

Re: Account number

Dear CREDO Member,

I'm writing to let you know that we'll be terminating our calling card and travel card services on December 31, 2012. Rest assured that this does not mean that CREDO is leaving the telecommunications business. We appreciate your making use of these services but we are moving to a new billing system and will not be able to continue providing calling card and travel card services. We're sending this notice nationwide to all of our customers who use our calling cards.

Your residential long distance service continues just as it did before and continues to generate donations for progressive causes. You do not need to do anything to continue to have CREDO residential long distance service.

If you need to continue to use a calling card, there are a number of other calling card options in your area. Get in touch with another telephone company before December 31, 2012, to sign up for a new calling card with a new provider.

We value your connection to CREDO and to the progressive causes we support. I hope we can meet all your communication needs with continued CREDO long distance service and CREDO Mobile service.

Sincerely,

Stephen Gunn

**VP of Customer Relations** 

**CREDO** 

(over, please)

FCC required notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible but no later than 15 days after the commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Section 63.71 Application of Working Assets Funding Service Inc. DBA Credo Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.



#### Maladahallandahalalahalahalalahalalalalah

Re: Account number

Dear CREDO Member,

I'm writing to let you know that we'll be terminating our calling card and travel card services on December 31, 2012. Rest assured that this does not mean that CREDO is leaving the telecommunications business. We appreciate your making use of these services but we are moving to a new billing system and will not be able to continue providing calling card and travel card services. We're sending this notice nationwide to all of our customers who use our calling cards.

Your residential long distance service continues just as it did before and continues to generate donations for progressive causes. You do not need to do anything to continue to have CREDO residential long distance service.

In addition, we offer excellent mobile service, CREDO Mobile, with voice plans that include free domestic long distance and start at just \$29.99 a month. CREDO Mobile has a great lineup of phones, including the Samsung Galaxy S III, the world's most popular smartphone. If you sign up for CREDO Mobile before 12/31, you can choose any handset—including the Galaxy S III for free! Call 888-800-4336 and mention special offer code 226800 or join online today at credomobile.com.

If you need to continue to use a calling card, there are a number of other calling card options in your area. Get in touch with another telephone company before December 31, 2012, to sign up for a new calling card with a new provider.

(over, please)

We value your connection to CREDO and to the progressive causes we support. I hope we can meet all your communication needs with continued CREDO long distance service and CREDO Mobile service.

Sincerely,

Stephen Gunn

**VP of Customer Relations** 

**CREDO** 

FCC required notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible but no later than 15 days after the commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the Section 63.71 Application of Working Assets Funding Service Inc. DBA Credo Long Distance. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.